

**REMARKS**

Claims 1-13, 16, and 18-28 are pending. By this Amendment, claims 14 and 15 are canceled without prejudice to or disclaimer of the subject matter recited therein. Claims 1 and 16 are amended. No new matter is added.

**I. Claim Rejections Under 35 U.S.C. §102**

Claims 1, 3-16 and 18-28 are rejected under 35 U.S.C. §102(e) as anticipated by U.S. Patent Application Publication No. 2003/001445 to Formanek et al. (Formanek). As claims 14 and 15 are canceled, the rejection of those claims is moot. The rejection of claims 1, 3-13, 16 and 18-28 is respectfully traversed.

Formanek fails to disclose each and every feature recited in the rejected claims as amended. For example, Formanek fails to disclose a method of converting a document in a page-image format into a form suitable for an arbitrarily sized display, comprising in sequential order: deconstructing a document in a page image format; synthesizing the deconstructed document into an intermediate data structure that is convertible into a commercially available format; and distilling the intermediate data structure for redisplay by converting the intermediate data structure into a format usable for an arbitrarily sized display, wherein the intermediate data structure is automatically adaptable at the time of display to constraints of any display device or circumstance of viewing, as recited in amended claim 1 for the similar features recited in amended claim 16.

As discussed in the October 6, 2005, Amendment, Formanek discloses a document reflowing technique whereby document images are transformed into alternate document images that fit within a give display width and/or are scaled to various sizes (paragraph [0002]). In the document reflowing technique disclosed in Formanek, an electronic document file is first converted or rasterized into an electric image representation such as a bitmap

(paragraph [0028]). Once the electronic document is in an image format as a bitmap, image or page decomposition is performed to identify the block positions of various text regions and graphical elements on the electronic document (paragraph [0029]). Then, the bitmap and text and graphic block positions are stored in a processing device such as a personal computer 102, the proxy server 114 as shown in Fig. 1A, or the computer 122 of Fig. 1B. The block positions and the bitmap image are then loaded onto a target device such as a PDA 100 (paragraph [0030]).

When the block positions and bitmap image are loaded onto the target display device of Formanek the document is "reflowed" to be properly displayed in the display width of the target device. In Formanek, it is necessary that reflowing software be used for the specific display device or PDA. As recited at paragraph [0030] "in other words, the user of the PDA 100 must load software that performs the reflowing process of the present invention onto the PDA 100. The software loaded onto the PDA 100 must correspond to the specific model of the PDA 100 that is being used. In that instance, the display width of the particular model is also preloaded into the reflowing software so that the display width can be readily determined. Alternatively, the user may specify a width within which to display the document."

Thus, in contrast to the language recited in the amended claims, before the document can be reflowed onto the target device, a specific target device must be known and have the reflowing software loaded thereon. Moreover, the specific display width of the particular model must also be provided whether preloaded into the reflowing software or manually included by the user. In contrast, the intermediate data structure of the amended claims is a data structure that is convertible into a commercially available format, the intermediate data structure is distilled for redisplay by converting the intermediate data structure into a format usable for an arbitrarily sized display and the intermediate data structure is automatically adaptable at the time

of display to constraints of any display device or circumstance of viewing. Support for the amended claim language may be found at least at paragraph [0021] of the specification of this application.

As the document reflowing technique of Formanek requires specific software to be loaded onto a known target device and the display width of the target device be set in advance either through preloaded software or by the user at the time of reflowing, Formanek clearly fails to disclose that the intermediate data structure is automatically adaptable at the time of display to constraints of any display device or circumstance viewing. Accordingly, withdrawal of the rejection of claims 1, 3-16 and 18-28 under 35 U.S.C. §102(e) is respectfully requested.

Regarding the rejection of claims 18-20 and 22-27, the Office Action indicates that these claims are directed toward a computer system for implementing the steps of claims 3, 6, 7 and 10-15 respectively. Accordingly, Applicants submit that these claims are also in condition for allowance for the reasons discussed above. Accordingly, Applicants submit that claims 18-20 and 22-27 are in condition for allowance.

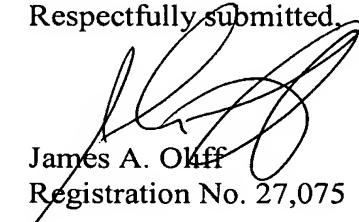
Regarding claims 21 and 28, as these claims depend from independent claim 16, claims 21 and 28 are also allowable for the reasons discussed above regarding independent claim 16. Accordingly, claims 21 and 28 are also in condition for allowance.

## **II. Conclusion**

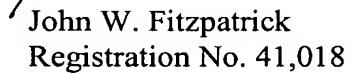
In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the pending are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075



John W. Fitzpatrick  
Registration No. 41,018

JAO:JWF/ldg

Date: February 28, 2006

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

<b>DEPOSIT ACCOUNT USE AUTHORIZATION</b> Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 24-0037
--